

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

<p><b>Plaintiff J.J.</b>, by and through his next friend, Sakeena Jackson; <i>et al.</i>, for themselves and all others similarly situated,</p> <p><b>Plaintiffs,</b></p> <p><b>v.</b></p> <p><b>Jon E. Litscher</b>, in his official capacity as Secretary of the Wisconsin Department of Corrections, <i>et al.</i>,</p> <p><b>Defendants.</b></p>	<p><b>Civil Action No. 17-CV-47</b></p>
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**DECLARATION OF J [REDACTED] J [REDACTED]**

I, J [REDACTED] J [REDACTED], pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am 17 years old and I was in custody at Lincoln Hills School for Boys (LHS) until earlier this month.
2. I was living with my mother in the City of Milwaukee, Wisconsin, when I was sent to LHS in April 2015, at age 15.
3. I spent much of the two years I was at Lincoln Hills in solitary confinement as punishment for violating a variety of LHS rules. I was in solitary <sup>more than</sup> ~~about~~ 10 times. In solitary, I usually spent 22 or 23 hours a day alone in my cell. I only got out for one hour of "out time" and another hour for school on days when there was a teacher.

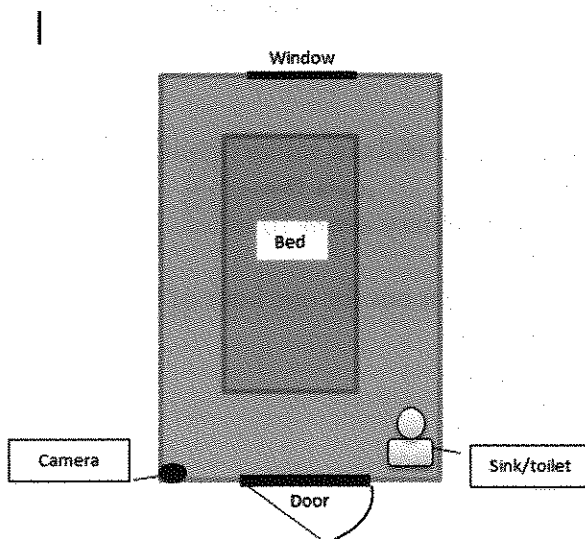
4. When I was in solitary, I was not allowed to go to other programs – like Aggression Replacement Training (ART) and Juvenile Cognitive Intervention Program (JCIP) – that were supposed to help me do better when I get back home.

5. Many of the guards (called “youth counselors”) in the solitary units – Krueger and Roosevelt security cottages – treated us like dogs in cages, causing us more trauma. They tried to provoke me to get me to do something so they could keep me in solitary longer.

6. When you first go into solitary, staff put you “on the belt,” no matter what you did to get sent to solitary. When they put me “on the belt,” my wrists were handcuffed to a belt around my waist whenever I was out of my cell for school or out time, and they chained me to a table or desk the whole time. I was “on the belt” most of the time I was in solitary.

7. The solitary cells they kept me in at Krueger or Roosevelt were small - about seven or eight feet by ten feet. They have a large metal door that swings out into the hall. The door has a small glass window about nose high and one or two slots for food trays. If you are on the belt, you have to put your hands through the door slot before and after they put you in the cell for the guards to lock or unlock the handcuffs.

8. The solitary confinement cells I was in look pretty much like this:



9. The windows in the doors of cells in the Krueger unit have a cover that the guards sometimes close so you can't see into the hallway.

10. The solitary cells I was in had a mattress on the floor or on a low frame. The cells in "high hall" – which is where you go when you first get sent to solitary and where you stay if the guards don't think you have earned a move to "low hall" – had a combination metal sink and toilet in the cells I was in. There is no other furniture, so you have to sit on either the toilet or the low bed. There is no desk or chair. There is no mirror or anything else on the walls. Many of the cells have no call button to call staff, so you have to scream or cover the surveillance cameras to get attention.

11. In "low hall" in Krueger, there is no toilet or sink in the room, so you have to turn on a call light so a guard can take you to the bathroom. Sometimes it took a long time for them to respond to the light, and I just couldn't hold it any more.

12. When I was in solitary, all I had was a toothbrush, the clothes I was wearing and a book or two. I didn't even get paper or a pencil or anything else to write or draw with. In low hall, you can keep mail in your room.

13. The light in the solitary cells I was in was lit 24 hours per day. The light is dimmed from approximately 10 p.m. to 6 a.m. but is not turned off.

14. The solitary cells I was in were dirty and smelled like sweat and urine. I couldn't flush the toilet in high hall cells myself, so I had to ask the guards to flush the toilet. Sometimes it takes them a long time to do it. I also only got a little bit of toilet paper and had to ask for more when I needed it.

15. From talking to other boys at Lincoln Hills who have been in solitary, it seems like their cells were pretty much the same as the ones I was in.

16. When they put me in solitary confinement the first time, I got really sad and depressed. All the times I was in solitary, I had trouble sleeping, felt anxious and restless, and got angry easily. Even little things, like being ignored, made me angry. I also have a bad back and being stuck in the room all day gave me lower back pain.

17. I was in solitary confinement multiple times and I am worried that I will be sent to solitary confinement again if I get sent back to Lincoln Hills.

18. I was also pepper sprayed five or six times at Lincoln Hills. Once in 2016, I was pepper sprayed when the guards were putting me in a van to drive me to the solitary cells. They sprayed me after I was in the van and closed me in with the cloud of mace inside.

19. Another time in 2015, I refused to go into my cell until I could talk to a supervisor about getting a shower. Several guards came and surrounded me and told me to get on the floor. I didn't get down right away, so the guards threatened me with pepper spray. Then I made a run for my cell, and the guards sprayed me as I went past and into my cell.

DD 20. They have different kinds of pepper spray with different names: mace, phantom, ~~bear mace~~ <sup>D.C.</sup>, and others. The spray was very painful. It made my skin and eyes burn and made it hard to breathe. Some of the sprays burned my skin more and others make it harder to breath or made me cough.

DD 21. After I was pepper sprayed, I was ~~been~~ taken to a shower cage, where they locked me in and had me wash off the pepper spray, and doing that burned my body. They also ~~make~~ <sup>made</sup> me take off my regular clothes and wear a paper gown when I went back to my cell. They also took away my regular mattress and gave me a hard rubber mat instead. DD

22. I've been pepper sprayed many times and I am worried that I will be pepper sprayed again if I end up back at Lincoln Hills.

23. I also got strip searched a lot at Lincoln Hills. Every time I had a visit from family or went to solitary I got strip searched. After a visit, a guard would take me into a room off the visiting area and make me take off all my clothes while he watched. The guard would make me hold down my ears so he could look behind them, look under my arms and private parts and make me squat and cough. When I was taken to solitary, a couple of guards would go into the cell with me and do the same kind of strip search, usually with the door open so youth in the cells across the hall could see. I was strip searched a few times when guards did a "shake down" looking for contraband in one of the regular cottages. In those shake down searches, the guards would take each youth, usually but not always one at a time, into the bathroom and do the same kind of strip search as after a family visit. These strip searches can be humiliating.

24. I've filed grievances and appeals about being put in solitary confinement and pepper sprayed. I'm no longer at Lincoln Hills, but because I'm seventeen years old I could be sent there again if I get in trouble.

I declare under penalty of perjury that the foregoing is true and correct.

Dated February 20, 2017.

The signature is written in black ink over a horizontal line. Below the line, the name is redacted with black boxes. The first box contains the letter 'J', and the second box contains the letter 'J'.